

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

XEROX CORPORATION

*

Plaintiff

*

v.

* CIVIL ACTION NO. L 02 CV 1734

PHOENIX COLOR CORPORATION

*

and

*

TECHNIGRAPHIX, INCORPORATED

*

Defendants

* * * * *

**PHOENIX COLOR'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

TO: XEROX CORPORATION

FROM: PHOENIX COLOR CORPORATION

Defendant Phoenix Color Corp., by its attorneys, requests that plaintiff Xerox Corporation file a written response to this Request and produce documents described below for inspection and copying. Defendant requests that the production take place in accordance with the definitions and instructions set forth below.

Definitions and Instructions

(a) Pursuant to Rule 34 of the Federal Rules of Civil Procedure, you are requested to serve your written response to this request for production within thirty (30) days after service of this request on your counsel or within fifteen (15) days after the date on which your initial pleading or motion is required, whichever is later. You are requested to have your response conformed to the requirements of the Federal Rules of Civil Procedure.

11/3/03
20

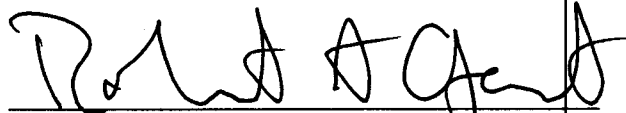
desire by you to obtain a personal or corporate guarantee from Phoenix Color with respect to any contract or lease.

14. A complete copy of the Xerox form #51858 ("Sale Maintenance Agreement") as used by Xerox in 1997, 1998, 1999 and 2000.

15. A complete copy of the Xerox form #51860 ("Lease Agreement") as used by Xerox in 1997, 1998, 1999 and 2000.

16. A complete copy of the Xerox form #51864 ("Addendum to Create a Separate Maintenance Agreement") as used by Xerox in 1997, 1998, 1999 and 2000.

17. All documents instructing Xerox employees, including, but not limited to, sales representatives, about the procedure for completing and obtaining approval for the form #51858 ("Sale Maintenance Agreement"), #51860 ("Lease Agreement") and #51864 ("Addendum to Create a Separate Maintenance Agreement").



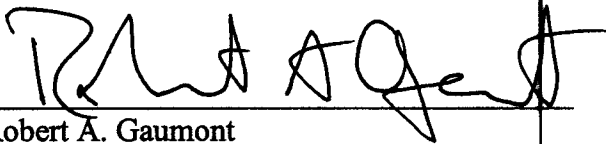
John R. Wellschlager (Fed. Bar No. 24752)
Robert A. Gaumont (Fed. Bar No. 26302)

Piper Rudnick LLP
6225 Smith Avenue
Baltimore, Maryland 21209
(410) 580-3000

*Attorneys for Phoenix Color Corporation and
Technigraphix, Incorporated, defendants*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3 day of January, 2003 a copy of Phoenix Color Corp.'s First Request for Production of Documents was served by hand delivery to: Sidney S. Friedman, Esquire and Rosemary E. Allulis, Weinstock, Friedman & Friedman, P.A., Executive Centre, 4 Reservoir Circle, Baltimore, Maryland 21208-7301, attorneys for plaintiff.


Robert A. Gaumont